

## REMARKS

This paper is responsive to the Office Action mailed February 5, 2007. Claims 1-42 were canceled without prejudice or disclaimer, rendering all the rejections with respect to Claims 1-42 moot. New Claims 43-78 have been added. Applicants submit that no new matter has been introduced. Further, applicants respectfully submit that Claims 43-78 of the present application are neither anticipated nor obvious over the cited and applied references, namely, U.S. Publication No. 2004/0176118, to Strittmatter et al. (hereinafter "Strittmatter"); Cornell, Microsoft Office XP Technical Articles, "Using the FileDialog Objects," April 2001 (hereinafter "Cornell"); and U.S. Publication No. 2002/0083228, to Chiloyan et al. (hereinafter "Chiloyan").

As recited by the newly added claims of the present application, a system for presenting device information in a unified and consistent way and for accessing and manipulating device information for user selected devices is presented. The system maintains a common dialog object displaying device information through a set of actionable icons. (Application, page 14, lines 2-6.) Device information is retrieved by accessing enumerated device information contained in a function discovery database. (Application, page 12, lines 20-21.) When an actionable icon is selected by a user, a reference for the device is returned by accessing the enumerated device information contained in the function discovery database. (Application, page 13, lines 4-5.) To facilitate communications between the common dialog object, a programming interface is used when accessing enumerated device information with the function discovery database. (Application, page 6, lines 25-26.)

Applicants submit that Strittmatter, Cornell, and Chiloyan, either in combination or alone, fail to teach or suggest enumerated device information contained in a function discovery database as recited by the claims. Strittmatter is purportedly directed to a system configured to perform a discovery process that causes a radio frequency transceiver to discover electronic

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devices having a compatible radio frequency transceiver. (Strittmatter, Abstract.) As taught, a search is performed to locate other wireless enabled devices. (Strittmatter, Par. [0041].) After completing the search process, the system displays the located devices to the user. (Strittmatter, Par. [0043].) After a user selects a device, a wireless communication link is established with that device. Strittmatter does not contemplate a function discovery database having enumerated device information, but instead Strittmatter retrieves enumerated device information from the devices themselves.

Cornell also fails to teach or suggest a function discovery database. Cornell is purportedly directed to a common dialog object. As taught in the publication, the common dialog object gives users and applications the ability to manipulate files and folders. (Cornell, page 1.) Because Cornell is directed only to the common dialog object and not a function discovery database, the prior art fails to teach or suggest the claims recited in the present application.

In addition, Chiloyan also fails to contemplate a function discovery database having enumerated device information. Chiloyan is purportedly directed to a method and system for using a peripheral device identifier obtained from a peripheral device to determine a network address from a database. (Chiloyan, Abstract.) As taught, the database contains network addresses and is employed to identify a network address for a remote device to download drivers for the peripheral device. (Chiloyan, Par. [0016].) Instead of the database taught by the recited claims of the present application, Chiloyan's database stores network addresses and not functions.

Generally described, under 35 U.S.C. §§ 102 or 103, a *prima facie* case of unpatentability can be established only if the cited references, alone or in combination, teach each and every element recited in the claim. Strittmatter, Cornell, and Chiloyan, alone or in combination, fail to

teach or suggest a function discovery database having enumerated device information. For the above reasons, applicants submit that the newly added claims of the present application are neither anticipated nor obvious in view of the prior art and assert that Claims 43-78 are patentable.

### CONCLUSION

In view of the foregoing claim amendments and remarks, applicants respectfully submit that all independent and dependent claims in the present application, Claims 43-78, are in condition for allowance. Accordingly, applicants respectfully request allowance of the present application. If any questions remain, applicants request that the Examiner contact the undersigned at the telephone number listed below.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read 'Sunah K. Lee', is written over the printed name of the law firm.

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